



July 14, 2010

Mr. Greg Hwang, Project Manager
Montgomery County Department of Transportation
Division of Transportation Engineering
100 Edison Park Drive, 4th Floor
Gaithersburg MD 20878

Dear Mr. Hwang:

Thank you for the opportunity to comment on the Montgomery County Department of Transportation's DRAFT *Alternatives Retained for Detailed Study* (ARDS) document for the Midcounty Corridor Study. It was noted that the ARDS defined in this document differ from the proposed ARDS that the City commented on in a letter to Mr. Bruce Johnston, Montgomery County Department of Transportation, from then acting City Manager Arnoult, dated February 25, 2008. Specifically, Alternative 11, Montgomery Village-Upper Watkins Mill, which the City supported, was not retained in the current document and Alternatives 2 and 5 were added.

Upon review, the City would like to offer the following comments on the alternatives proposed to be retained:

Alternative 1, No Build

The City acknowledges that this alternative is required to be retained for analysis purposes.

Alternative 2, Transportation Systems Management/Transportation Demand Management

The City acknowledges that this is a standard alternative retained in transportation projects.

Alternative 4, Goshen-Wightman-Brink

As stated in the 2008 letter, this alternative has little or no impact potential for the City of Gaithersburg. The City supports this alternative being included as an ARDS.

Alternative 5, MD 355

This alternative has been added to the list of ARDS since those recommended in 2008. Staff is very concerned by this alternative. This alternative directs traffic into the already failing Montgomery Village Avenue (MD 124) and MD 355 intersection and would increase overall traffic on an already congested MD 355. Many of the proposed road modifications to MD 355 are sited within the incorporated limits of the City and may

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conflict or impact both adopted Master Plans and development plans. Additionally, references to "Frederick Road" should be changed to "Frederick Avenue" within the City limits.

Alternative 8, Master Plan Alignment from Watkins Mill Road

As stated in the 2008 letter, the City has concerns in that this alternative directs additional traffic to Montgomery Village Avenue, MD 355, and Watkins Mill Road. This alternative creates the potential for "cut through" trips on Christopher Avenue and Russell Avenue. Finally, immediately following the Lower Watkins Mill section, this alternative follows the Master Plan with City Comments below.

Alternative 9, Master Plan Alignment

The City has previously voiced its concerns with this alternative in regards to potential impacts to City neighborhoods, natural resources, and Blohm Park. The City has noted the proposed bridging in this area to minimize impacts and as further studies are completed, looks forward to reviewing the results.

Once again, the City is encouraged to see progress on this much needed project to alleviate pressures on both I-270 and MD 355. Thank you for the opportunity to comment on the DRAFT *Alternatives Retained for Detailed Study* and the City looks forward to continuing to partner with the County on the Midcounty Corridor Study.

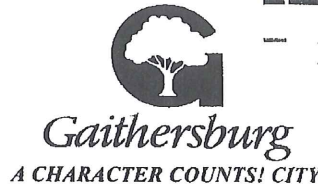
Sincerely,

A handwritten signature in black ink, appearing to read "Gregory J. Ossont". The signature is fluid and cursive, with the first name "Gregory" and last name "Ossont" clearly distinguishable.

Greg Ossont, Director
Planning and Code Administration

Attachment

cc: Angel Jones, City Manager
Mayor and City Council
Jim Arnoult, Director Public Works
Ollie Mumpower, Engineering Services Director



Distribution M&C: 3/3/08

February 25, 2008

Mr. Bruce Johnston P.E.
Division Chief
Division of Capital Development
DPWT
101 Monroe Street 9th Floor
Rockville MD 20850

RE: Midcounty Corridor Study

Dear Mr. Johnston:

Thank you for the opportunity to comment on the M-83, Midcounty Corridor Study. We are very excited to see progress in this much needed alternative to Maryland Route 355. However, as you are aware, the City of Gaithersburg is directly impacted by the project and we continue to be concerned about the potential negative impacts that this project may have on the City's infrastructure, communities, parks and natural resources. Environmental concerns were summarized in a letter from the City's Environmental Affairs Director, Erica Shingara dated October 8, 2004. A copy is attached for your review.

Upon review, it was noted that 5 alternatives have been recommended to be retained for more detailed study. While the City notes the basis and reasoning for retaining alternatives 1, 4, 8, 9 and 11, the City maintains its concerns on the impacts of each alternative. More specifically, the following is a summary of City concerns as it relates to each alternative:

Alternative 1 (No Build) – This alternative is the “no build” option which is required to be maintained throughout the evaluation period.

Alternative 4 (Goshen-Wightman-Brink) – This alternative has little or no impact potential for the City of Gaithersburg. Staff supports this alternative being included as an ARDS.

Alternative 8 (Lower Watkins Mill – Master Plan) – Staff notes that this alternative directs additional traffic to Montgomery Village Avenue, MD 355, and Watkins Mill Road. Additionally, this alternative creates the potential for “cut through” trips on Christopher Avenue and Russell Avenue. Finally, immediately following the Lower Watkins Mill section, this alternative follows the Master Plan alignment which significantly impacts both City neighborhoods, natural resources and Blohm Park.

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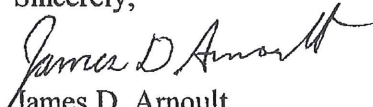
Alternative 9 (Master Planned Alternative) – Staff notes significant impacts to City neighborhoods, natural resources and park properties.

Alternative 11 – Montgomery Village – Upper Watkins Mill – This alternative has little or no impact to the City. Staff supports this alternative being included as an ARDS.

Additionally, City staff will be contacting Montgomery County staff to request a public work session on the M-83, Midcounty Corridor project. It has been several years since the Mayor and City Council have been briefed on this project by County staff and I believe it would be beneficial to do so as the Montgomery County Department of Public Works and Transportation moves forward into the preparation of the ARDS Concurrence and Draft Environmental Document phases of the study.

Thank you again for the opportunity to comment on the M-83, Midcounty Corridor project.

Sincerely,


James D. Arnoult
Acting City Manager

Attachment

cc: Mayor and City Council
Fred Felton, Assistant City Manager
Greg Ossont, Planning and Code Administration
Lauren Pruss, Planning Director
Erica Shingara, Environmental Affairs



October 8, 2004

Ms. Jeri Cauthorn
Montgomery County Department of Public Works and Transportation
101 Monroe Street
Rockville, Maryland 20850-2540

Re: **MidCounty Highway/Middlebrook Rd**

Dear Ms. Cauthorn:

Thank you for the opportunity to review and comment on the *Draft Environmental Site Assessment for Midcounty Highway/Middlebrook Road, Montgomery Village Avenue to MD 27 (Ridge Road), Project No. 509337*. Gaithersburg recognizes the need for regional transportation improvements and the draft report represents an ambitious, comprehensive effort to carefully examine the environmental resources that are potentially impacted by the proposed project.

Upon review, the City of Gaithersburg has the following initial comments:

1. On the Environmental Feature Plan (sheet 2 of 9), near the Watkins Mill Crossing, the map does not identify a potential or proposed right-of-way (ROW) for the proposed highway extension. Including a proposed ROW on this map would help the City evaluate potential impacts on the Windbrooke Community, stream and wetland areas, and Blohm Park.
2. *Residential communities:* The highway extension is in close proximity to several residential communities within the City and will likely impact these communities. Such communities include Village Overlook, Woodland Hills, Montgomery Meadows (not identified in the text of the draft report), and Windbrooke. The City requests that this project work closely with these communities to educate them on the proposed project and provide opportunities for public comment and participation. The City would be willing to assist with this process.
3. *Stormwater management:* Wetland Area 2 is a stormwater management facility for the Woodland Hills development. How will the project impact this facility? If this facility is impacted, will additional stormwater management measures be designed to control and treat runoff from this community? How will the project provide stormwater management for the proposed roadway expansion?

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4. *Wetlands and Waters of the U.S.:* Portions of the proposed alignment near Watkins Mill Elementary School and Blohm Park fall within wetlands, forested steep slopes, erodible soils, hydric soils, and clusters of specimen trees. According to Gaithersburg's Environmental Standards for Development Regulation, the City requires a 50 foot-wide buffer around wetlands. The City requests an evaluation of alternatives for this area to minimize impacts on environmental sensitive areas.
5. *Parkland:* The project is proposed to bisect Gaithersburg's Blohm Park, located at 18900 Watkins Mill Road. This park contains trails, a pond, bridges, and a gazebo. The City requests additional information on the proposed impacts to this park and any mitigation measures.
6. *Forests:* According to the report, 63% of the 120-foot-wide right-of-way corridor is forested and approximately 307 specimen trees may be impacted by the proposed project. It would be helpful to include the specimen/significant tree numbers on the Environmental Features Plan to coordinate with Table 3. Will there be reforestation mitigation requirements for the project?
7. *Noise:* The report does not reference existing sources or noise and potential noise impacts. Considering the proximity to surrounding residential areas and wildlife areas, will a noise analysis be conducted as part of future planning?

Gaithersburg recognizes the complexity of balancing transportation demands and community impact with environmental protection and looks forward to future coordination on this project. If you have any questions regarding these comments, please do not hesitate to contact me at 301-258-6310.

Sincerely,



Erica Shingara

Environmental Specialist

cc: David B. Humpton, City Manager
Fred Felton, Assistant City Manager
Tony Tomasello, Assistant City Manager
Greg Ossont, Director of Planning and Code Administration
Jim Arnoult, Director of Public Works, Parks Maintenance & Engineering
Michele McGleish, Director of Parks, Recreation & Culture